

EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and
as Co-Administrator of the Estate of Charles E. Hollowell,
deceased, and JESSICA HOLLOWELL-McKAY,
as Co-Administrator of the Estate
of Charles E. Hollowell, deceased,

CIVIL ACTION NO.: 1:21-cv-00704-JLS

Plaintiffs,

v.

HP, INC., and STAPLES, INC.,

Defendants.

REQUEST FOR PRODUCTION OF TANGIBLE THINGS

Pursuant to the Federal Rules of Civil Procedure, Rule 34 and Local Rule of Civil Procedure 26, the Defendant, HP, INC. ("HP" or "defendant"), hereby requests that the Plaintiffs, CAROL S. MARCELLIN, individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, deceased (together, "Plaintiffs"), produce at the office of Smith, Sovik, Kendrick & Sugnet, PC, 6245 Sheridan Drive, Suite 218, Williamsville, New York 14221, the following tangible things on **September 28, 2023 at 10:00 a.m.**:

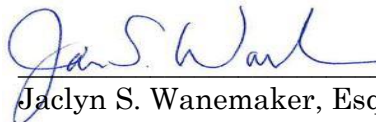
1. Compaq computer allegedly purchased in the 1990s referred to in Plaintiff's answers to interrogatories; and
2. The computer battery pack allegedly purchased by Plaintiff in 2015 referred to in Plaintiff's answers to interrogatories.

Dated: August 25, 2023

Respectfully Submitted,

HP INC.,
By its attorneys,

Smith, Sovik, Kendrick & Sugnet, P.C.



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UNITED STATES DISTRICT
COURT WESTERN DISTRICT OF
NEW YORK

CAROL S. MARCELLIN, Individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, Deceased,

Plaintiffs,

v.

HP, INC., and STAPLES, INC.,

Defendants.

**PLAINTIFFS' S RESPONSE TO
HP'S REQUEST FOR
PRODUCTION OF TANGIBLE
THINGS**

Civ. No. 1:21-cv-00704-JLS

Plaintiffs, by their attorneys, Faraci Lange, LLP, as their responses to Defendant HP, INC.'s Request for Production of Tangible Things:

1. The 1990s vintage Compaq computer was destroyed in the fire and is no longer in the possession of Plaintiffs so cannot be produced.
2. The subject battery pack and laptop are currently in the possession of Fire Research and Technology, 7317 Route 14, Sodus Point, NY 14555, where HP's experts previously examined them. If another examination is required, Plaintiffs will make arrangements.

DATED: September 21, 2023
Rochester, New York

FARACI LANGE, LLP

/s/ Stephen G. Schwarz

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